

1140 Avenue of the Americas, 17th Fl New York, NY 10036

> (212) 301-7632 tai@taiparklaw.com

November 14, 2023

VIA ECF

Honorable Lewis J. Liman United States District Judge Southern District of New York 500 Pearl Street, Room 701 New York, New York 10007

REQUEST GRANTED.

The Court approves the modification to Mr. Shvartsman's bail conditions to allow him to travel as proposed.

11/15/2023 so ordered.

LEWÍS J. LIMAN United States District Judge

Re: United States v. Michael Shvartsman, et. al., No. 23 Cr. 307 (LJL)

Dear Judge Liman:

On behalf of Michael Shvartsman, defendant in the above-referenced case, I write to request that the Court modify the travel restrictions imposed on the defendant as a condition of his bail, as indicated below. I have communicated in writing with Assistant United States Attorney Matthew Shahabian, and Mr. Shahabian advised that the Government does not have an objection to this application.

My client would like to take his family to Colorado for a ski vacation from January 3, 2024, until January 9, 2024. We have committed to provide the U.S. Attorney's office and pretrial services detailed travel plans as they become available.

As I have noted above, AUSA Shahabian has no objection to this application, and if the Court is inclined to grant it, we request it do so by endorsing this letter with an endorsement above.

Very truly yours,

Tai H. Park

Counsel for Michael Shvartsman

cc: All counsel of record